April 4, 1995

DOCKET NO. P-3008/CI-94-403

ORDER ACCEPTING QUARTERLY REPORTS

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Don StormChairTom BurtonCommissionerJoel JacobsCommissionerMarshall JohnsonCommissionerDee KnaakCommissioner

In the Matter of the Fiscal Year 1995 Budget Proposed by the Telecommunications Access for Communication-Impaired Persons Board ISSUE DATE: April 4, 1995

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PROCEDURAL HISTORY

On June 7, 1994, the Commission issued an Order approving the TACIP¹ Board's Fiscal Year (FY) 1995 budget and requiring the Board to continue to file quarterly reports.

Pursuant to that requirement, the TACIP Board filed 3rd and 4th quarter 1994 reports on October 11, 1994, and January 10, 1995.

On December 15, 1994, and January 27, 1995, Deafness Education & Advocacy Foundation (DEAF)² filed comments on the quarterly reports.

In February, 1995, the Board filed responsive comments and an addendum to its 4th quarter 1994 report.

On March 21, 1995, the Board's 3rd and 4th quarter 1994 reports came before the Commission for consideration.

¹ Telecommunications Access for Communication-Impaired Persons

² Under contract with TACIP, DEAF staffs and implements the Message Relay Service.

FINDINGS AND CONCLUSIONS

I. SUMMARY OF COMMISSION ACTION

The Commission finds that the TACIP Board's 3rd and 4th quarter 1994 reports, including figures on long distance call accounting and projected revenues and expenses, are responsive to previously articulated Commission requirements. The Commission will accept the reports. Discussion of several important issues from the reports follows.

II. BILLING SYSTEM ISSUES

The TACIP Board contracts with the Minnesota Equal Access Network Services (MEANS) to bill for long distance calls placed through the Message Relay Service (MRS). MEANS transmits billing information to the various local exchange carriers (LECs), which include long distance MRS charges on customers' local service bills.

Customers have lodged complaints regarding untimely receipt of MRS toll charges. TACIP stated that some LECs are holding toll MRS toll bills for two or three months before adding them to customers' local bills. This practice is contrary to TACIP's goal that all customers should receive bills within 60 days of calls being placed.

DEAF has also received some complaints regarding incorrect long distance billings stemming from outdated information on Extended Area Service toll-free rates.

The Commission urges the Board to continue resolving these issues, working with MEANS where helpful. The Commission encourages the Board to continue to work toward its 60-day goal for long distance billing, and to track customer complaints to monitor progress on billing issues.

III. AUTOMATIC NUMBER IDENTIFICATION

Automatic Number Identification (ANI) is a system by which the calling party's telephone number is automatically collected when a long distance call is placed. ANI allows a communications assistant at a relay service to relay a call without verbally requesting the calling party's telephone number.

In its quarterly reports the Board stated that it had formally approved the acquisition of ANI. In order to implement the service the Board has requested 950 service from US WEST Communications, Inc., its local exchange carrier. ANI should be in place for metropolitan area calls within two months.

The Board stated that previously anticipated growth in service demand had not materialized. This fact had eliminated the present need for a backup relay at this time, freeing budgeted funds for the purchase of the ANI system.

The Board has demonstrated sound reasons for the purchase of ANI. In its June 7, 1994, Order, the Commission noted that ANI can shorten connection time and reduce the opportunity for toll fraud. ANI can reduce the number of incorrect originating numbers for long distance billing and help provide more "functionally equivalent" service for communication-impaired users.

Although the purchase of ANI has never been specifically approved as a budget item, the Commission notes that the Board has the autonomy to shift expenditures between line items in its current budget. As long as the FY 1995 budget can support the ANI purchase, the Board has the discretion to proceed.

The Commission encourages the Board to continue tracking incorrect numbers and their dollar volume in order to more clearly document the need for ANI. This information could be included in future quarterly reports.

IV. MESSAGE RELAY SERVICE EFFICIENCY

Communications Assistants (CAs) are specially trained operators who work with the telecommunications relay service. CAs make possible the transmission of telephone messages between conventional telephone users and communication-impaired persons using special telephone equipment.

Because wages and benefits for CAs are among the largest items in the TACIP budget, the Commission needs information on CA relay efficiency in order to review TACIP's proposed budgets. In its June 7, 1994, Order, the Commission required the Board to include specified information on CA efficiency rates in the Board's quarterly reports.

The Board complied with the Commission's requirement in its 3rd and 4th quarter filings.

DEAF's comments showed areas of disagreement with the Board regarding some of the Board's decisions and regarding the extent of the Board's control over DEAF's operations.

The Commission therefore encourages DEAF and the Board to continue to work together to improve MRS efficiency. The Commission urges the parties to develop a mutually agreeable CA utilization (or efficiency) rate. To that end, the Commission strongly encourages TACIP and DEAF to file joint responses to the following questions regarding CA efficiency:

- 1. The statistics required in the Commission's June 7, 1994, Order: 1) average number of CAs on duty during each hour of the day; 2) average number of minutes of incoming and outgoing calls for each hour of the day; 3) average number of minutes of each hour of the day used for call set-up, connection, and wrap-up; 4) average length of incoming and outgoing calls for each hour of the day; 5) average number of minutes during each hour of the day the "average CA" is actually relaying calls or is involved in call set-up, connection, and wrap-up.
- 2. Characteristics of call patterns at the relay's peak usage point during each hour of the day, specifically: 1) number of calls per hour; 2) average length of call per hour; 3) number of simultaneous calls going through the relay at the peak usage point for each hour; 4) number of CAs available to relay calls at the peak usage point for each hour; 5) number of CAs required to answer all calls within 10 seconds at the peak usage point for each hour; 6) number of CAs required to answer 85% of calls within 10 seconds at the peak usage point for each hour.

If TACIP and DEAF cannot agree on a methodology to assess CA efficiency, both parties should submit complete explanations of their proposed methodologies to the Commission by July 1, 1995, the deadline for the Board's second quarter 1995 report.

If either TACIP or DEAF disagrees with the idea of responding to the CA efficiency inquiries listed above, that party should so note in its July 1, 1995, filing, and should include the information it believes should be used instead.

ORDER

- 1. The Commission accepts the TACIP Board's 3rd and 4th quarter 1994 reports, including projected revenues, call accounting, and MRS efficiency information.
- 2. The Commission encourages DEAF and the Board to continue to work together to improve MRS efficiency. The Commission urges the parties to develop a mutually agreeable CA utilization (or efficiency) rate. To that end, the Commission strongly encourages TACIP and DEAF to file joint responses to the questions regarding CA efficiency included in the body of this Order.
- 3. If TACIP and DEAF cannot agree on a methodology to assess CA efficiency, both parties should submit complete explanations of their proposed methodologies to the Commission by July 1, 1995, the deadline for the Board's second quarter 1995 report.
- 4. If either TACIP or DEAF disagrees with the idea of responding to the questions regarding CA efficiency included in the body of this Order, that party should so note in its July 1, 1995, filing, and should include the information it believes should be used instead.

5. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar Executive Secretary

(SEAL)